

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

DSCF STANDARD MAIL LOAD LEVELING

Docket No. N2014-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MALONE
TO PUBLIC REPRESENTATIVE INTERROGATORIES
(PR/USPS-T1-24(a) and (d))
(February 3, 2014)**

The United States Postal Service files the responses of witness Linda Malone to the following interrogatories of the Public Representative, filed on January 15, 2014: PR/USPS-T1-24(a) and (d). Responses to parts (b), (c), (f) and (g) were filed on January 31, 2014. Part (e) has been redirected to the Postal Service for an institutional response. The interrogatory is stated verbatim and followed by the responses to parts (a) through (d), as well as the previously filed and unchanged responses to parts (b), (c), (f) and (g). The responses filed today supersedes the partial response filed on January 31, 2014.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

Anthony F. Alverno
Chief Counsel
Global Business & Service Development

Michael T. Tidwell

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260
(202) 268-2998; Fax -5402

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MALONE
TO PUBLIC REPRESENTATIVE INTERROGATORY**

Revised: February 3, 2014

PR/USPS-T1-24

USPS-LR-N2014-1/6, file "1-10-14" are slides from a January 10, 2014 presentation given on the Load Leveling Plan. Slide 25 lists "Frequently Asked Questions/Concerns" including "early delivery" of mail entered on Thu/Fri/Sat and "5 Day Delivery implications."

- a. Please identify, describe, and provide any documents not previously provided that the Postal Service has generated to address mailer questions or concerns regarding the Load Leveling Plan.
- b. Please describe the impact 5 Day Delivery would have on the load levels throughout the week after the nationwide implementation of the Load Leveling Plan. In your response, please address both DSCF Standard Mail volume specifically, as well as the overall mail volume.
- c. Please identify, describe, and provide all documents detailing the impact of implementation of both 5 Day Delivery and the Load Leveling Plan.
- d. Please explain the intended meaning of "Early delivery of mail entered on Thu/Fri/Sat" on slide 25 of file "1-10-14".
- e. Under current practices, what percentage of DSCF Standard Mail entered on Thursday or Friday is delivered "early" on Saturday, rather than Monday? Please disaggregate the response by entry day.
- f. How does the Load Leveling Plan impact the potential savings of 5 Day Delivery?
- g. How does the Load Leveling Plan impact the ability of the Postal Service to realize its full estimated savings of 5 Day Delivery?

RESPONSE

- a. All documents known to have been generated to-date by the Postal Service have been provided.
- b. I am not aware of any study of the impact of five-day delivery on Load Leveling. However, assuming that mailers would drop ship mail in a five-day environment on the same days as in the present environment, the implementation of load leveling would lessen the impact to delivery operations in making the transition to a situation where Standard Mail is delivered five-days per week to street addresses.
- c. Please see USPS Library Reference USPS-LR-N2014-1/6, 6-12-13.pdf.

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RESPONSE to PR/USPS-T1-24 (continued)

- d. The term “early delivery” is often used to describe delivery of Destination Sectional Center Facility (DSCF) Standard Mail with a 3-day service standard that occurs before the third day after acceptance. However, the service standard for deferrable mail, including Standard Mail, reflects a goal of delivery by the day identified in the service standard, and does not include a commitment to delivery on a specific day.
- e. [Redirected to the Postal Service to determine if an institutional response can be developed.]
- f. I am not aware of any study of the impact of five-day delivery on load leveling.
- g. I am not aware of any study of the impact of five-day delivery on load leveling.